

SPEARS & IMES LLP

767 Third Avenue
New York, NY 10017
tel 212 213-6996
fax 212 213-0849

Max Nicholas
tel 212-213-1715
mnicholas@spearsimes.com

November 7, 2022

BY ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Rene Allard*, 20 Cr. 163 (PKC)

Dear Judge Castel:

I respectfully write in advance of Rene Allard's sentencing, which is scheduled for November 15, 2022, to inform the Court that there are two individuals who wish to speak on Mr. Allard's behalf at sentencing if that would be amenable to the Court: his fiancé Joanie Leonard, and his friend Donald MacRae. These individuals would not speak about the offense conduct, but rather, about their personal experiences with Mr. Allard and his character. Each of these individuals has also written a letter on behalf of Mr. Allard, and those letters were submitted with counsel's sentencing memorandum.

I have notified the Government of this request, and the Government has indicated that it defers to the Court on whether these individuals may speak at the sentencing.

Thank you for considering this request.

Respectfully submitted,

/s
Max Nicholas
Attorney for Rene Allard

The Court will consider
written submissions on behalf
of the defendant and not
oral presentation.
SO ORDERED
[Signature]
USDJ
11-7-22